



DEPARTMENT OF THE ARMY  
BLUE GRASS ARMY DEPOT  
431 BATTLEFIELD MEMORIAL HIGHWAY  
RICHMOND, KENTUCKY 40475

May 3, 2018

SUBJECT: Class 3 Hazardous Waste Permit Modification Request, Treatment of VX Munitions

Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP)

Blue Grass Army Depot (BGAD)

EPA ID #KY8-213-820-105, AI #2805

SDN: 24915-00-TKD-GGPT-20201

Commonwealth of Kentucky  
Department for Environmental Protection (KDEP)  
Division of Waste Management (DWM)  
Hazardous Waste Branch  
ATTN: Ms. April J. Webb, PE, Manager  
300 Sower Boulevard, 2<sup>nd</sup> Floor  
Frankfort, KY 40601

Dear Ms. Webb:

The purpose of this correspondence is to submit the attached request for a Class 3 Hazardous Waste Storage & Treatment permit modification to add the treatment of VX munitions to the BGAD RCRA permit. Enclosed is a hard copy of Volumes I and II of the request plus an additional hard copy of both volumes with Operations Security (OPSEC), International Traffic in Arms Regulation (ITAR), and Export Administration Regulations (EAR) information redacted. The redacted version of the modification request will be placed in each public repository for public review. A CD containing both original and redacted copies is also being provided to KDEP. Permit controlled documents listed in Table D-9 of Appendix D-1 were recently provided to KDEP with the RD&D Rev. 6a submittal. Therefore, these drawings are only provided on the CD.

A public meeting to announce and provide information to describe this permit modification request will be scheduled to coincide with this submittal. Documentation for the meeting will be provided to DWM as required.

If you have any questions or require additional information, please contact Mr. Joe Elliott, BGAD Chemical Demilitarization Project Coordinator, at (859) 779-6021, or Mr. John McArthur, BPBG Environmental Manager, at (859) 625-6447.

**"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."**

Sincerely,



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Ron Hink  
Project Manager  
Bechtel Parsons Blue Grass  
BGCAPP Operator



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Norbert A. Fochs  
Colonel, U.S. Army  
Commanding  
Blue Grass Army Depot

Enclosures

cc:

Dale Burton, KDEP  
Heather Alexander, KDEP  
Brian Ballard, ACWA  
Todd Williams, ACWA  
John McArthur, BPBG  
Joe Elliott, BGAD